

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

## UNITED STATES DISTRICT COURT

for the

District of

Division

**22-CV-00551**

Case No.

(to be filled in by the Clerk's Office)

LEONARD CARTER

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

UNIVERSITY OF WASHINGTON

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Jury Trial: (check one) ☒ Yes ☐ No
 FILED  
 LODGED  
 RECEIVED
**MAIL**

APR 21 2022

 AT SEATTLE  
 CLERK U.S. DISTRICT COURT  
 WESTERN DISTRICT OF WASHINGTON  
 BY DEPUTY

## COMPLAINT FOR A CIVIL CASE

## I. The Parties to This Complaint

## A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address

LEONARD CARTER  
1170 HARRISON STREET, APT. #310  
SEATTLE, WASHINGTON 98109-5345  
206-854-5524  
LEOCARTERMARKETING@YAHOO.COM

## B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

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Defendant No. 1

Name

Job or Title (if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address (if known)

UNIVERSITY OF WASHINGTON School of DENTISTRY  
1959 N.E. PACIFIC ST.  
SEATTLE, WASHINGTON 98195  
206-598-3300  
help@uw.edu.

Defendant No. 2

Name

Job or Title (if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address (if known)

Defendant No. 3

Name

Job or Title (if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address (if known)

Defendant No. 4

Name

Job or Title (if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address (if known)

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case. <sup>①</sup> IN PURSUANT TO THE CIVIL RIGHTS ACT OF 1964 BY U.S. PRESIDENTS JOHN F. KENNEDY AND LYNDON B. JOHNSON. <sup>②</sup> IN PURSUANT TO RCW 9.91.010 <sup>③</sup> IN PURSUANT TO RCW 49.06.050

**B. If the Basis for Jurisdiction Is Diversity of Citizenship****1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, (name) \_\_\_\_\_, is a citizen of the State of (name) \_\_\_\_\_.

**b. If the plaintiff is a corporation**

The plaintiff, (name) \_\_\_\_\_, is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

**2. The Defendant(s)****a. If the defendant is an individual**

The defendant, (name) \_\_\_\_\_, is a citizen of the State of (name) \_\_\_\_\_ . Or is a citizen of (foreign nation) \_\_\_\_\_.

## b. If the defendant is a corporation

The defendant, (name) \_\_\_\_\_, is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_.

Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) \_\_\_\_\_.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

## 3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

## III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

THE UNIVERSITY OF WASHINGTON SCHOOL OF DENTISTRY TOLD ME IN AUGUST, 2015 THAT THEY WERE GOING TO STRAIGHTEN OUT MY TEETH WITH INVISALIGNERS FOR 2 YEARS WHICH THEY DID, AND THEN GIVE TEETH IMPLANTS AFTER THE ORTHODONTAL WORK. WHEN IT WAS TIME FOR THE PERIODONTAL WORK TO BE DONE. THE UNIVERSITY OF WASHINGTON SCHOOL OF DENTISTRY DENIED ME. THEY SAID NO. THEY LIED TO ME.

## IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

I AM ASKING THE COURT FOR FOUR TOOTH IMPLANTS TO BE DONE BY THE DENTAL DEPARTMENT. THE PRICE FOR ONE TOOTH IMPLANT IN OF 2017 WAS THREE THOUSAND DOLLARS. THE PRICE OF ONE TOOTH IMPLANT IN 2022 IS FIVE THOUSAND DOLLARS. I NEED FOUR TEETH IMPLANTS. THE PRICE IS TWENTY THOUSAND DOLLARS. I AM ASKING THE COURT FOR TWENTY THOUSAND DOLLARS FOR FOUR TOOTH IMPLANTS, PLEASE. I AM ALSO ASKING THE COURT FOR NINE-HUNDRED AND NINETY-NINE MILLION DOLLARS FOR BOTH MENTAL

AND EMOTIONAL DISTRESS. I KNOW I WAS DISCRIMINATED AGAINST BY THE UNIVERSITY OF WASHINGTON SCHOOL OF DENTISTRY FACULTY AND STAFF. THERE WERE NO POLICE REPORTS OR CHARGES FILED AGAINST ME. I AM INNOCENT OF THEIR ACCUSATIONS. THIS WAS A BLATANT ACT OF DISCRIMINATION. THEY WERE PREJUDICE AND DISCRIMINATORY AGAINST ME. I SEEK JUSTICE FOR THEIR UNFAIR AND INHUMANE ACTS.

# V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

## A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 4/18/2022

Signature of Plaintiff

Printed Name of Plaintiff

Leonard Carter  
LEONARD CARTER

## B. For Attorneys

Date of signing: 4/18/2022

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

PRO SE: Leonard Carter  
PRO SE: LEONARD CARTER

Leonard Carter  
1170 Harrison Street  
Seattle, Washington 98109, apt. 310  
206-854-5524  
LEOCARTERMARKETING@YAHOO.COM